

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOAN BURKE, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

v.

HEARST COMMUNICATIONS, INC.,

Defendant.

Case No. 1:21-cv-08994-ER-GWG

WILLIAM MARTIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

HEARST COMMUNICATIONS, INC.,

Defendant.

Case No. 1:21-cv-09624-ER-GWG

**NOTICE OF MOTION TO CONSOLIDATE AND
APPOINT INTERIM CLASS COUNSEL**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declarations of Erin Green Comite and Frank S. Hedin, and the exhibits attached thereto, Plaintiff Joan Burke (the “*Burke* Plaintiff”) and Plaintiff William Martin (the “*Martin* Plaintiff”), plaintiffs in the above-captioned actions (the “California Actions”), respectfully move this Court, before the Honorable Magistrate Judge Gabriel W. Gorenstein, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 6B, 500 Pearl Street, New York, New York 10007, for an order consolidating the California Actions, pursuant to Federal Rule of Civil Procedure 42(a), and appointing Erin Green Comite of Scott+Scott Attorneys at Law LLP, counsel for the *Martin* Plaintiff, and Frank S. Hedin of Hedin Hall LLP, counsel for the *Burke* Plaintiff (collectively,

“Proposed Co-Lead Counsel”) as interim Class counsel to represent the proposed Class pursuant to Federal Rule of Civil Procedure 23(g).

Dated: December 9, 2021

Respectfully submitted,

s/ Erin Green Comite .
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*Proposed Co-Lead Class Counsel for
Plaintiffs and the Putative Class*

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

s/ Erin Green Comite
Erin Green Comite